

REMARKS

**Status of Claims:**

Claims 1-32 are present for examination.

**Acknowledgment of Previously Filed IDS:**

The examiner is **AGAIN** requested to acknowledge receipt of the certified copy of applicant's priority document filed together with the application on **December 15, 2000**.

This is applicant's **THIRD** request for such acknowledgment.

**Prior Art Rejection:**

Claims 1-3, 5-11, 13-19 21-27 and 29-32 stand rejected under 35 USC § 102 as anticipated by Tran (6054990). Further, claims 4, 12, 20 and 28 stand rejected under 35 USC § 103 as obvious over Tran.

The examiner's rejections are respectfully traversed.

Tran is directed toward a computer system utilizing handwriting recognition and annotation. Handwriting recognition may be implemented utilizing a "graffiti" recognition process described in column 9 of the patent, which is similar to that utilized by the Palm Operation Systems. Voice recognition for input of data is also described as, for example, in column 10 of Tran. Fig. 5 describes a pen input method of entering data in which sketches may be input by a user and stored in the device. The sketches are matched against a library containing definitions and symbols for predetermined objects. These graphic objects will be inserted automatically if they are recognized as being close matches to the input sketch made by the user. Similar techniques as those employed in the "graffiti" text recognition may be employed also in the graphic object recognition.

In contrast, applicant's invention is directed toward a method and an apparatus which is usable in a portable radio communication terminal in which content is downloaded from the internet and text is expressed in a descriptive language such as, for example, HTML or

SMIL. Input character data may be also be provided by means of a keyboard or the like as shown in applicant's Fig. 13. Style processing may be performed in the portable radio communication terminal in order to optimize the display in view of the relatively small size of the display screen. Image and text files may be overlaid after the inputted text files are converted into a description language (e.g., HTML or SMIL) as shown, for example, in Figs. 14–15.

In order to better differentiate applicant's invention from the Tran reference, applicant has amended independent claims 1 and 17. For example, amended claim 1 is directed toward an expression style processing method for a portable radio communication terminal which transmits/receives a multimedia content from an object having at least character data and image data through a network including a radio data communication network. The method comprises performing within the radio communication terminal the steps of:

- (a) receiving a plurality of objects from an internet download using the radio data communication network;
- (b) inputting character data using a character input device in said radio communication terminal;
- (c) converting the input character data into a descriptive language, the converted character data forming additional objects;
- (d) storing the plurality of objects and the additional objects as stored objects;
- (e) generating an expression style format for expressing the stored objects; and
- (f) storing the expression style format.

As may be seen from the above description of applicant's claim 1, the plurality of objects, which includes at least character data and image data (and may additionally optionally include voice data) are downloaded from the internet using the communication network. Further, character data may be input using a character input device such as, for example, applicant's character input section 12 shown in applicant's Fig. 2. The character

data which is input utilizing the input device is converted into a descriptive language as shown, for example, in step S6 in applicant's Fig. 3. The converted character data forms additional objects. The plurality of objects and the additional objects are stored as "stored objects." Further, after storing the stored objects, applicant's method goes on to recite the step of generating an expression style format for expressing the stored objects and storing the generated expression style format. See, for example, step 8 and following steps in applicant's Fig. 3.

Applicant's claim may readily be seen to distinguish over Tran at least in the limitations which are directed to inputting the character data and converting the inputted character data into a descriptive language so that the "additional objects" which are stored with the plurality of objects as "stored objects" are subject to expression style formatting and subsequent storage. No such counterpart teachings are shown in the Tran reference. Since applicant's claims recite limitations not found in the Tran reference, Tran can not be applied as a Sec. 102 rejection since in order for a reference to anticipate a claim, the reference must disclose each and every claimed limitation. This is certainly not the case as pointed out above, and thus the Sec. 102 rejection must be withdrawn. Further the deficiencies of the Tran reference are such that Tran does not make obvious applicants invention as recited in the amended claims and thus the PTO has not made out a *prima facie* case of obviousness under the provisions of 35 USC 103.

Applicant's independent apparatus claim 17 is similar to method claim 1 and distinguishes over Tran for essentially the same reasons set forth above with regard to claim 1. Thus it is submitted that claims 1 and 17 are patentable over the prior art.

Applicant has amended the dependent claims to be consistent with the limitations found in amended claims 1 and 17. As such, it is submitted that the dependent claims are likewise distinguishable over Tran and all of applicant's claim are patentable thereover.

**Conclusions:**

In view of the arguments set forth above, it is submitted that the Patent and Trademark Office has not made out a *prima facie* case of obviousness under the provisions of 35 U.S.C. § 103.


It is submitted that the application is now in condition for allowance and an early indication of same is earnestly solicited.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741.

If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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By 

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